

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

DENNIS P. RIVERO, M.D.,

Plaintiff,

vs.

CIVIL NO. 16-cv-00318 JB/SCY

**BOARD OF REGENTS OF THE
UNIVERSITY OF NEW MEXICO
d/b/a UNIVERSITY OF NEW MEXICO
HEALTH SCIENCES CENTER,**

Defendant.

JOINT MOTION TO AMEND CASE MANAGEMENT DEADLINES

COME NOW Plaintiff and Defendant in this action (hereinafter the "Parties"), by and through their respective counsel, and move the Court to amend the remaining case management deadline by one month. As grounds for this motion, the Parties state the following.

1. An Order Setting Case Management Deadlines and Discovery Parameters [Doc. 51] was entered on February 7, 2017.
2. An Order Amending Case Management Deadlines [Doc. 77] was entered on May 12, 2017.
3. A Stipulated Order Amending Case Management Deadlines [Doc. 155] was entered on January 5, 2018.
4. As of the date of filing of this motion, all case management deadlines have passed except those relating to drafting of the pre-trial order.
5. Pre-trial order deadlines are as follows:
 - a. Plaintiff to Defendant: March 2, 2018
 - b. Defendant to Court: March 16, 2018

6. The final filing of pre-trial dispositive motions occurred on February 14, 2018.
7. The parties participated in a hearing on Plaintiff's Motion to Compel [Doc. 137, filed Nov. 22, 2017] on February 16, 2018.
8. Supplementation of responses and production pursuant to the hearing is due on February 23, 2018. [Doc. 181, "Clerk's Minutes," filed Feb. 15, 2018].
9. Both parties agree that amending the deadlines will not prejudice either party, and given the voluminous briefing that recently concluded, additional time to draft the pre-trial order will benefit the parties.
10. Therefore, the Parties ask that the pre-trial order deadlines be moved forward in time slightly.

11. The deadlines proposed by the Parties are:

- a. Plaintiff to Defendant – March 30, 2018
- b. Defendant to Court – April 13, 2018

WHEREFORE, for the reasons stated above, the Parties respectfully request that the Court enter an order reflecting the requested change to pre-trial order deadlines.

Respectfully submitted,

ERIC D. NORVELL, ATTORNEY, P.A.

/s/ Eric D. Norvell
Eric D. Norvell
2292 Faraday Ave., Suite 70
Carlsbad, CA 92008
(760) 452-0808
enorvell@norvellfirm.com
Attorney for Dennis P. Rivero, M.D.

PARK & ASSOCIATES, L.L.C.

/s/Lawrence M. Marcus
Alfred A. Park
Lawrence M. Marcus
6100 Uptown Blvd. Ste. 350
Albuquerque, NM 87110
(505) 246-2805
Attorneys for UNM Board of Regents